

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
WILLIAM J. GAVIN,)	
)	
Plaintiff,)	
)	Civil Action No. 04-12207-GAO
v.)	
)	
BULL HN INFORMATION)	
SYSTEMS INC.,)	
Defendant.)	
_____)	

PROPOSED JOINT CASE SCHEDULING ORDER

Now come the parties to the above captioned matter and respectfully request that their proposed Scheduling Order in this matter be allowed, as follows:

Joint Discovery Plan:

Fact discovery (conforming to the discovery limits set forth in F.R.Civ.P. Rule 26(c)), to be completed on or before December 30, 2005.

Schedule for Filing Dispositive Motions and Pretrial Events

Dispositive motions to be filed by February 15, 2006, with forty five days allotted for response.

Case Management Conference pursuant to Local Rule 16.3 to be held on May 1, 2006 for the purpose of exploring the possibility of settlement, for establishing the identification of expert witnesses on the issue of damages, for the scheduling of this matter for Final Pre-Trial Conference and for Trial, and for all other matters deemed appropriate by the Court.

The parties propose that a trial by jury be scheduled for August 1, 2006.

Magistrate Judge

The defendant does not consent to trial before a magistrate judge.

Respectfully submitted:

WILLIAM J. GAVIN,

/s/ Howard I. Wilgoren

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BULL HN INFORMATION SYSTEMS
INC.,

/s/ Mary Jo Harris

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Dated: May 11, 2005